

Thank you for the opportunity to provide feedback on the Zoning Commission's current racial equity analysis tool. I will start off by saying that this is a step in the right direction to looking at racial equity regarding zoning in DC. While I applaud the zoning commission for developing this racial equity tool, it feels more like an item being checked off a “racial equity” checklist instead of proposing real change.

Racial inequity exists in DC and is compounded by the fact that civic engagement is a privilege afforded to those who can take time off work so their voices are heard. The system that exists today seems built by and for developers and not the hardworking individuals and families residing in the district.

In my own personal experience with the Board of Zoning Adjustment (BZA), I estimate that I had spent more than 30 hours of my personal time preparing documentation and testimony and attending BZA hearings. That is almost an entire work week amount of time! Luckily, I have employment where my schedule is flexible, so I could dedicate this time. However, if I were a bus driver, police officer, or teacher, I would not have that same luxury. By default, you are excluding a large swath of working individuals - the ones who will be directly impacted by the decisions made by zoning and the BZA - due to this barrier.

To make your racial equity lens more substantive, I suggest that the Zoning Commission conduct a study and published data that reports the percentages of service-based housing (like Community-Based Institution Facilities (CBIF), halfway houses, and addiction recovery homes) by Ward. The published data that the public has access to is not complete, not centralized, or up-to-date. How can you have a racial equity strategic plan if you do not know where a high concentration of these services housing exist today?

According to publicly available data, under-resourced and predominately black wards are already doing their part in providing service-based

housing for the District of Columbia. For example, Ward 7 has at least 40% of these types of service homes, while more affluent (and predominantly white) Wards have less than 10% combined. Even though Ward 7 is doing its part already and covering the slack of white and affluent wards, it has not prevented more CBIFs and other service-based housing from being approved and opened.

To provide a specific example: in 2021, development began on a lot in our neighborhood. The owner repeatedly told neighbors that he was building a home for his family. This is what he told us for 18 months. Turns out he is a developer and wanted to open a new CBIF in our community. He lied to all the neighboring homeowners, and we were included in any of the previous discussions regarding this facility. Since we are in an R2 zone, it is a matter of right to have a CBIF for up to 6 individuals. However, he sought a special exception from the BZA because they wanted to have 12 individuals there.

Did the neighbors know anything about this? No. Not until we received a letter outlining how we could participate in the hearing. I will spare you all the details, but I would like to note that this passed the BZA even though 37 homeowners, 16 within 200 feet, our ANC, a neighboring ANC, and two civic associations asked the board to deny this request because it is located within ½ of a well-documented 24/7 human, sex, and drug trafficking area along Eastern Avenue NE.

There does not seem to be a strategic plan to address racial inequity in the district. In my experience, it seems as if the landscape is the developers having a “if I build it, they will come.” In that statement, they is DC government-funded services houses.

Unfortunately for all of us residing in Ward 7, developers come here because we have what's left of affordable land. However, we lack resources that other Wards – like readily accessible grocery stores, employment opportunities, and neighborhoods without daily illegal activity.

If you really wanted to address racial inequity, you would start by providing the percentage of service-based housing by Ward.

Understandably, you would not disclose the address or information that would make a population unsafe; however, you can say this Ward has this % of this type of service home.

Then, you would have a racial equity tool that would be referenced by every case in front of the BZA – so they can make informed decisions about where they approve service-based homes. This transparency would go a long way to addressing the racial inequity that exists in the current system.